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15 MEGAN WHITE, *et al.*

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17 **UNITED STATES DISTRICT COURT**  
18 **EASTERN DISTRICT OF CALIFORNIA**  
19 **SACRAMENTO DIVISION**

20 MEGAN WHITE, JERONIMO AGUILAR, ) Case No. 2:21-cv-02211-JAM-DB  
21 LOREN WAYNE KIDD, LYRIC NASH, )  
22 NICOLLETTE JONES, and ODETTE ZAPATA, ) **STIPULATION AND ORDER MODIFYING**  
23 Plaintiffs, ) **PRETRIAL SCHEDULING ORDER**  
24 v. )  
25 SACRAMENTO POLICE DEPARTMENT; THE )  
26 CITY OF SACRAMENTO; DANIEL HAHN; )  
27 and DOES 1-200 (the names and numbers of )  
28 which are currently unknown), )  
Defendants. )

1 Pursuant to Fed. R. Civ. P. 6(b)(1) and Civil Local Rules 144(a), Plaintiffs Megan White, Jeronimo  
2 Aguilar, Loren Wayne Kidd, Lyric Nash, Nicollette Jones, and Odette Zapata (“Plaintiffs”) and Defendants  
3 the City of Sacramento, the Sacramento Police Department, and Daniel Hahn (“Defendants”), collectively  
4 “the parties”, by and through their respective counsel of record, hereby stipulate as follows:  
5

6 WHEREAS, on August 10, 2022, the Court issued a Pretrial Scheduling Order (Dkt. No. 34), and  
7 then amended the pretrial scheduling order on June 20, 2023 (Dkt. No. 46) and on October 23, 2023 (Dkt.  
8 No. 51).

9 WHEREAS, the October 23, 2023 Amended Pretrial Order provides that the date for completion of  
10 discovery is May 1, 2024, the date for disclosure of expert witnesses is May 15, 2024, the date for  
11 disclosure of rebuttal witnesses is June 19, 2024; dispositive motions shall be filed by July 2, 2024, and  
12 hearing on such motions shall be on September 10, 2024 at 1:30 PM; the Final Pretrial Conference is set for  
13 October 29, 2024 at 10:00 AM and the Jury Trial is set for December 2, 2024 at 09:00 AM in Courtroom 6  
14 (JAM) before District Judge John A. Mendez.

15 WHEREAS, Plaintiffs served a Second Set of Requests for Production of Documents on July 21,  
16 2023, but Plaintiffs were not satisfied with Defendants’ responses because Plaintiffs considered them  
17 incomplete. After multiple meet and confer sessions Defendants agreed to supplement those responses  
18 between October 13 and October 20, 2023.

19 WHEREAS, Plaintiffs served a Third Set of Requests for Production of Documents on October 3,  
20 2023.

21 WHEREAS, Plaintiffs were not satisfied with Defendants’ supplemental responses to the Second Set  
22 of Requests for Production of Documents and responses to the Third Set of Requests for Production of  
23 Documents because Plaintiffs considered them incomplete, and Plaintiffs agreed to propose search terms to  
24 assist Defendants in identifying additional responsive documents.

25 WHEREAS, the parties agreed in December 2023 to search terms to assist Defendants in identifying  
26 additional documents responsive to Plaintiffs’ Second and Third Set of Requests for Production of  
27 Documents.

1 WHEREAS, Defendants agreed to run all search terms by January 18, 2024.

2 WHEREAS, on January 18, 2024, Defendants stated that certain searches would need to be  
3 completed manually, thereby requiring more time.

4 WHEREAS, on January 25, 2024, Defendants stated that, barring unforeseen difficulties, they  
5 anticipated their production to be complete by March 30, 2024.

6 WHEREAS, Defendants stated that they would produce documents responsive to Plaintiffs' requests  
7 on a rolling basis.

8 WHEREAS, on March 20, 2024, Defendants stated that they were still in the process of reviewing  
9 and, as necessary, redacting responsive documents, and represented that they had only one individual who  
10 was capable of that review and redaction.

11 WHEREAS, Plaintiffs served a second set of Special Interrogatories on Defendants on March 26,  
12 2024, and responses are being drafted.

13 WHEREAS, on March 31, 2024 and April 3, 2024, Defendants stated that additional documents  
14 responsive to Plaintiffs' requests would be forthcoming.

15 WHEREAS, as of the date of this stipulation, documents responsive to Plaintiffs' discovery requests  
16 are still being produced.

17 WHEREAS, as of the date of this stipulation, meet and confer efforts remain ongoing.

18 WHEREAS, Plaintiffs anticipate that, after Plaintiffs receive Defendants' complete responses to  
19 Plaintiffs' discovery requests, further meeting and conferring may be necessary to ensure the parties have  
20 mutually satisfied their discovery obligations.

21 WHEREAS, Plaintiffs anticipate that the responsive documents that have yet to be produced by  
22 Defendants will be relevant to Plaintiffs' expert reports.

23 WHEREAS, Plaintiffs have noticed additional 30(b)(6) and percipient witness depositions for April  
24 2024.

25 WHEREAS, Plaintiffs anticipate that this deposition testimony may be relevant to Plaintiffs' expert  
26 reports.

27 WHEREAS, the parties had a settlement conference before Magistrate Judge Allison Claire on

1 March 18, 2024.

2 WHEREAS, Judge Claire continued the settlement conference to April 29, 2024.

3 WHEREAS, the parties feel that several sessions may be necessary to resolve the case given the  
4 complexity of the case.

5 WHEREAS, the parties are still interested in pursuing meaningful settlement discussions and believe  
6 that extending the deadlines will promote those efforts.

7 WHEREAS, the parties believe that the filing of dispositive motions will distract from settlement  
8 efforts, but all parties desire to preserve the right to seek pre-trial relief if settlement is not possible.

9 WHEREAS, the parties now believe that in order to complete discovery, designate expert witnesses,  
10 engage in meaningful settlement and, if necessary, file and have hearing on dispositive motions, it will be  
11 necessary to extend all current pretrial dates and the trial date by approximately six weeks.

12 WHEREAS, the parties agreed to extend the deadline for completion of discovery to June 15, 2024  
13 for the limited scope of (i) completing outstanding percipient witness depositions, (ii) the outstanding Rule  
14 30(b)(6) deposition, (iii) ensuring that all productions are complete, and finally, (iv) up to six additional  
15 percipient witness depositions and up to one additional Rule 30(b)(6) deposition, and agreed to extend all  
16 other deadlines as set forth in this joint request.

17 WHEREAS, this joint request is being made in the interests of judicial economy and in good faith  
18 and will not prejudice any party.

19 WHEREAS, the parties have shown good cause for the stipulated extensions pursuant to Fed. R.  
20 Civ. P. 16(b)(4), in light of the parties' diligent efforts on discovery to date and the parties' desire to  
21 participate in meaningful settlement discussions.

22 NOW THEREFORE, Plaintiffs and Defendants hereby stipulate, subject to the approval of this  
23 Court for good cause shown, that:

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1. The deadline for parties' completion of discovery shall be extended to June 15, 2024.
2. The deadline for parties' disclosure of expert witnesses shall be extended to July 1, 2024.
3. The deadline for parties' disclosure of rebuttal experts shall be extended to August 5, 2024.
4. The deadline for filing dispositive motions be extended to August 19, 2024. Hearing on such

1 motions shall be on October 21, 2024 at 1:30 PM

2 5. The date for the Final Pretrial Conference be extended and SET for December 2, 2024 at  
3 10:00 AM and the date for Jury Trial be extended and SET for January 21, 2025 at 09:00 AM in Courtroom  
4 6.

5 Respectfully submitted,

6 Dated: April 17, 2024

7 SIEGEL, YEE, BRUNNER & MEHTA

8 /s/ Dan Siegel

9 DAN SIEGEL

10 Attorneys for Plaintiffs MEGAN WHITE, JERONIMO  
11 AGUILAR, LOREN WAYNE KIDD, LYRIC NASH,  
12 NICOLLETTE JONES, and ODETTE ZAPATA

13 Dated: April 17, 2024

14 SACRAMENTO CITY ATTORNEY

15 /s/ Sean Richmond

16 SEAN D. RICHMOND

17 Attorneys for Defendants  
18 SACRAMENTO POLICE DEPARTMENT; THE CITY OF  
19 SACRAMENTO; DANIEL HAHN

1 **ATTESTATION**  
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I, Kayla Webster, attest that all other signatures listed, and on whose behalf the filing is submitted, concur in the filing's contents and have authorized the filing.

5 */s/ Kayla Webster*  
6 Kayla Webster  
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## ORDER MODIFYING PRETRIAL SCHEDULING ORDER

Based on the stipulation of the parties and good cause appearing, the Pretrial Scheduling Order, is  
**MODIFIED** as follows:

Event	Date
Discovery Cutoff Date	<b>08/02/2024</b>
Disclosure of Expert(s) Deadline	<b>06/07/2024</b>
Supplemental Disclosure Deadline	<b>06/21/2024</b>
Dispositive Motion Filing Deadline	<b>09/27/2024</b>
Dispositive Motion Hearing	<b>12/03/2024, at 1:00 p.m.<sup>1</sup></b>
Joint Mid-Litigation Statement Filing Deadline	Fourteen (14) days prior to the close of discovery
Joint Pretrial Statement Filing Deadline	<b>01/16/2025</b>
Final Pretrial Conference	<b>01/24/2025, at 10:00 a.m.</b>
Jury Trial (20 days)	<b>03/10/2025, at 9:00 a.m.</b>

All other instructions contained in the August 10, 2022 Pretrial Scheduling Order (ECF No. 34) shall remain in effect.

IT IS SO ORDERED.

Dated: April 22, 2024

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE

<sup>1</sup> Calendars are subject to last minute changes. Contact the Courtroom Deputy for available dates.